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Federal Communications Commission
Office of Secretary

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: **Number Portability - CC Docket No. 95-116**

Dear Mr. Caton:

On Friday, February 21, on behalf of SBC, Link Brown, Wayne Masters and Gary Fleming, and on behalf of Pacific Telesis, Alan Ciamporcero and on behalf of Bell Atlantic, Ray Albers and I met with Jim Casserly of Commissioner Ness's Office. We discussed the attached materials, network reliability and cost issues and the advantages of allowing LECs the option of utilizing LRM with QoR to implement Local Number Portability. A copy of the hand-out used in the meeting is attached.

Due to the late hour at which the meeting ended, this ex parte is being filed today. Please enter this letter into the record as appropriate.

Sincerely,

Attachments

cc: J. Casserly

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List ABCDE

LNP Implementation Schedule

- FCC Objective - ensure rapid introduction of LNP to facilitate competition.

- LNP is a complex project impacting every major switching and signaling component.

- Ordered implementation plan not consistent with industry (and NRC) implementation methods for major network changes.

LNP Implementation Schedule

- Because of concerns with the impact of the current plans on network reliability, SBC commissioned independent Bellcore study on impacts on Houston network.

- Bellcore released Special Report SR-4257, *Quantification of the Effects of Local Number Portability on the Reliability of Southwestern Bell's Network.*

LNP Implementation Schedule

- Study projects significant increases in probability of widespread network outages with current implementation plans.

- Study identifies root causes:
  - Inadequate time for installation, testing, soak
  - Lack of query reduction techniques
  - Initial introduction in largest metropolitan areas
  - Selection of busiest season of year

LNP Implementation Schedule

- SBC recommends that the FCC take the following steps to reduce risk:
  - Extend implementation schedule for Houston, Dallas and St. Louis by 3 months. Other MSAs to complete on FCC's original schedule.
  - Permit use of QoR to reduce query volumes.
  - Start with limited set of Houston switches to allow adequate software soak.

LNP Implementation Schedule

Conclusion:

- Current plan creates unnecessary added risks.
- Risks are reduced through use of QoR and extension of implementation periods.
- Same start (10/1/97) and complete (12/31/98) dates
- Proposed changes do not jeopardize Commission objectives

Query on Release (QoR)

- QoR is more cost efficient than LRN.

- Cost savings, which are passed to the public, are long term - Conversion to LRN is not inevitable

- QoR increases network reliability by reducing: 1) the concentration of traffic into LNP databases and 2) the load increase on SS7 network caused by LRN.

Query on Release (QoR)

- Concerns raised about QoR have been adequately addressed:
  - Cost savings
  - Reliance on other carrier's databases and network facilities
  - Call set up time variances
  - Use of Lucent or other vendors' QoR schedules as basis for waiver request
- TCG supports voluntary use of QoR

Query on Release (QoR)

AT&T/MCI Ex Parte Misleading

- By AT&T's own figures, 800 Service volumes are minuscule in comparison to originating local interoffice call rates:291B for interswitch intraLATA versus 0.9B for 800 messages (12 X 74M)

- Comparisons of 800 to LRN implying that implementation is routine is inappropriate. LRN does not use 800 software or technology.

- ILECs do routinely install new switches and software - but in a sound process using methods to reduce risks.

Query on Release (QoR)

AT&T/MCI Ex Parte Misleading

- Projected porting rates are not realistic or relevant
  - Ignore expected prevalence of resale
  - Implies equal porting in all offices
  - Porting rates do not equate directly to costs, switch break over points misinterpreted.
- Statement that only calls to new entrant customers are impacted is false. SBC will port numbers for both win backs and for location portability.

Query on Release (QoR)

AT&T/MCI Ex Parte Misleading

- Claims about call set up costs are illusory:
  - Call set up associated with QoR does not represent any incremental costs because calls are being routed to the serving switch today.
  - With LRN those same calls would also require database dip in order to complete which creates an unnecessary process and higher costs.